



July 19, 2010

Ecology and Environment, Inc.
Attn: Steven G. Hall
720 Third Avenue, Suite 1700
Seattle, WA 98104

**Re: Results of a review of Golder's Avery Landing Site Pre-Field Class I Cultural Resources Assessment report for the Avery Landing Project Area, Shoshone County, Idaho.
Applied Archaeological Research, Inc., Report No. 948.**

Dear Mr. Hall:

At your request, Applied Archaeological Research, Inc. (AAR) reviewed the draft version of a pre-field Class I cultural resources assessment prepared by Thomas Hoffert of Golder Associates Ltd. (Golder) on behalf of Potlatch Land and Lumber, LLC (Potlatch) for the Avery Landing site near Avery, Idaho. The site is the former location of a railroad roundhouse and maintenance facility used between 1907 and 1977 by the Chicago, Milwaukee, St. Paul & Pacific Railroad that is located on the bank of the St. Joe River. It is contaminated with petroleum hydrocarbons that persist in the subsurface as free product that are seeping to the St. Joe River. Because of the presence of the petroleum hydrocarbon contamination and related threats to human health and the environment, the Environmental Protection Agency (EPA) is currently pursuing a non-time-critical removal action (NTCRA) at the site to address the contamination. As a part of the NTCRA, the EPA directed that a cultural resources review be conducted for the site to ensure compliance with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, and its implementing regulations, 36 CFR 800. AAR's review of the Golder report was performed to assist Ecology and Environment, Inc. (E & E) in providing technical oversight to the EPA. It was performed by Erica D. McCormick, M.Sc., RPA, and Bill R. Roulette, M.A., RPA.

The report includes an introduction and several chapters that include brief context statements related to the natural and cultural environment, a description of potential impacts, a description of proposed mitigation for impacts, a concluding section, a closure, and references cited. It was reviewed to determine whether the work performed is of suitable quality similar to other work of this type that EPA can rely on its findings. Then, based on the results presented in the Golder report, AAR is to provide recommendations and a scope of work outline for the necessary steps to complete a Class I inventory.

Results of the Review

In AAR's opinion, the draft report is of marginal quality in terms of its content and its internal logic. It includes some information that the EPA can rely on but overall it suffers from a lack of clarity and direction.

The author (Hoffert 2010:ES-1) describes the Golder report as a Class I inventory and provides the following description of what that type of report entails: "an overview of State Historic Preservation Office (SHPO) files of all previous archaeological inventories and recorded sites located in the area of potential effect (APE) of the proposed project." It is more likely the case that the Class I inventory was also to include a determination as to whether additional archaeological studies were appropriate. This is not stated as an objective in the report but much of it is dedicated to that topic.



As stated in the report, the research in the Idaho SHPO files was performed by Glenda King, Curator of Archaeology at the Idaho SHPO. The results of the research are summarized in two tables in the report. The tables show that one site (referred to in the report as both site 10SE476 and as site 10SE479) is located at Avery Landing. AAR accepts the work of Ms. King as reliable. The part of the report, essentially Tables 2 and 3 in Chapter 4, that list where previous archaeological work has been performed and where archaeological resources have previously been recorded provides the EPA with reliable information. The remainder of the report, we find, is not of suitable quality similar to other work of its type that provides the EPA with reliable findings.

Chapter 1, *Introduction*, describes the purpose of the Golder study and of Ms. King's research at the Idaho SHPO. Chapter 2 presents an environmental overview. Cultural resource management documents usually contain such sections and other than the author mis-conceptualizing the site's geologic setting and irregular use of capitalization, it is adequate.

Chapter 3 presents statements on the prehistory and history of the area and region. The section on the local history appears borrowed from another report that had as its subject matter Idaho mining. It also includes a section on the town of Avery that may have been largely plagiarized from the website cited in the text and from Wikipedia.

The Avery Landing site, the presumed topic of the Golder report, is first mentioned on the third page of the *Historic Period* (Chapter 3.2). It is described in one sentence and not mentioned again in the chapter, which goes on to discuss the related topics of the history of the Chicago, Milwaukee, St. Paul & Pacific Railroad Company and the town of Avery. More information about the historical use of the roundhouse and maintenance facility in this section would have been helpful in developing arguments later in the report as to whether additional archaeological studies at the site are appropriate. What kind of activities occurred at the facility? Did the facilities include a bunkhouse for the workers?

As noted previously, Chapter 4 presents the results of Ms. King's research. This chapter would have been improved by the inclusion of a description of site 10SE476 (or 10SE479) located at proposed NTCRA site. Since later in the report (Chapter 6) the author builds a case arguing against the need for archaeological investigations at the site, it would be beneficial to know such basic things as: what the site consisted of when it was recorded; if it was recorded based on historical information or archaeological fieldwork; and if it is known to contain archaeological deposits.

The *Potential Impacts* chapter (Chapter 5) is a straightforward presentation of the options available for remediating the contaminated sediment at the site. It features standard compliance language.

It is within the chapter titled *Proposed Mitigation for Potential Impacts* (Chapter 6) that we find the gist of the report. This chapter is actually mis-titled and it does not in fact describe any mitigative actions. It essentially lays out the author's argument as to why no archaeological investigations are needed at the site. The closest the author comes to actually suggesting how to lessen the impacts that could occur to site 10SE476 (or 10SE479) as a result of the NTCRA is to say that in the event that there is federal involvement in the project, Potlatch would hold on to any artifacts that were found so that they can be examined by a qualified historical archaeologist. This hardly qualifies as a description of the mitigation of the damage caused to a site.

In this chapter site 10SE476 (or 10SE479) is described as lacking any surface artifacts or other indications of the roundhouse and maintenance, repair, and fueling depot that once stood there. The author describes the activities that have occurred at the site since Potlatch acquired it. The assumed



impacts of these activities are apparently supposed to support the author's conclusion that "All of these previous industrial activities at the Site have caused any historic artifacts associated with site 10SE479 which may be buried within the fill to now lack provenience."

This is a spurious claim and indicates a misunderstanding of the archaeological concept of provenience. Of course artifacts found in the fill will have provenience. What they may or may not possess is their original historical provenience but even that is a trifling concern. If it can be established that artifacts found at the site originated at it, the fact that they are not where some railroad worker deposited them ca. 1920 is not critical in their having interpretive value. The claim also suggests unfamiliarity with historic-era archaeological sites and site formation processes, in general.

The concluding chapter (Chapter 7) starts by restating the results of the records review conducted by Ms. King at the Idaho SHPO. It includes the statement: "Site (10SE476) has purportedly been destroyed however subsurface remains and artifacts associated with the site may still exist within the fill. However, these possibly buried artifacts have been previously disturbed and as such lack precise provenience" (Hoffert 2010:16).

This statement is confusing for a variety of reasons. First, who has purported that the site has been destroyed? There is no statement to that effect other than the author's own. Secondly, after claiming that the site is purportedly destroyed, it is claimed that it may still exist archaeologically. Thirdly, what is the importance of the artifacts lacking precise provenience, and indeed, what does that phrase mean? If the author intends to have the reader infer that because of the lack of "precise provenience" the site requires no archaeological investigation, he is mistaken. Plow zone sites, landfill sites, and a variety of other archaeological site types are composed of artifacts that lack their original historical provenience but are nonetheless sources of much valuable information about the past. In addition, this apparently is not a strongly held opinion because reading further the author states that no archaeological investigations are needed as long as there is no federal involvement in the NTCRA: everything changes should the federal government become involved.

The remainder of the concluding chapter provides a list of tasks that are recommended to be conducted should Section 106 compliance become required. The recommendations are framed as necessary to complete "a cultural resources inventory" (Hoffert 2010:16). They include reviewing General Land Office maps, consultation with the affected Tribes, an intensive pedestrian survey, a determination of effect and associated recommendations, and the preparation and submission of a report. The recommendations are mostly appropriate. However, Avery Landing contains a recorded site that as described elsewhere in the report lacks surface archaeological deposits or features (Hoffert 2010:13). With that information in mind, what is the purpose of conducting a pedestrian survey?

The final report elements are a closure and references cited section. Other than noting the heavy reliance on web-based resources, as revealed by a perusal of the latter, these sections do not warrant comment.

Recommendations

The other assignment tasked to AAR was to develop recommendations and a scope of work to complete a Class I inventory. The purpose of the Class I inventory is to identify known properties in a project area and to determine if a more intensive survey is appropriate. The Golder report has started this process but it lacks the most basic information regarding site 10SE476 (or 10SE479) and its determination



of whether a more intensive survey is appropriate is based on poorly framed arguments, and whether or not the federal government becomes involved in the remediation project.

The determination of whether additional archaeological studies are appropriate at the Avery Landing site should be informed by the archaeological sensitivity of a property. This can be accomplished by developing a more robust historic context and taking into account the historical and modern land uses of the site area.

With this in mind, in addition to those in the Golder report, we make the following recommendations:

- Determine the ownership/lessee or other surface management boundaries of the NTCRA at the Avery Landing site.
- Conduct research into the history of use of site 10SE476/10SE479. This research should focus on identifying the material waste stream related to its operations.
- Determine the location of site 10SE476/10SE479 relative to previous and proposed disturbances.
- Describe the level of disturbance related to each type of remediation option.
- Model the potential for archaeological resources to be present.
- Prepare a project report describing the results of the background research, an assessment of the archaeological potential of the project area, and recommendations for the need for more intensive archaeological investigations, as appropriate.

Following these recommendations, and the appropriate ones made in the Golder report, it is AAR's opinion that the Class I inventory process will be complete.

If you have any questions concerning AAR's review of the Golder report, our recommendations, or our scope of work, please contact the first author at 503-281-9451 or at bill@aar-crm.com. Thank you.

Sincerely,

Bill R. Roulette, M.A., RPA
Principle Investigator

Erica D. McCormick, M.Sc., RPA
Project Archaeologist/GIS Specialist

Reference Cited:

Hoffert, Thomas
2010 *Avery Landing Site Pre-Field Class I Cultural Resources Assessment*. Draft Report. Submitted to Potlatch Lumber, LLC, Spokane, WA. Prepared by Golder Associates, Calgary, Alberta.